

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action

Lead Case No.:  
3:21-CV-00259-DCG-JES-JVB

CECILIA GONZALES, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,

Defendants.

Consolidated Case No.:  
1:21-CV-00965-DCG-JES-JVB

**GONZALES PLAINTIFFS' NOTICE OF FILING EXPERT WITNESS REPORTS**

Pursuant to the Court's Supplemental Pretrial Scheduling Order dated May 1, 2025 (Dkt. 921), Plaintiffs Cecilia Gonzales, Agustin Loredo, Jana Lynne Sanchez, Jerry Shafer, and Debbie Lynn Solis (the "Gonzales Plaintiffs") hereby file the expert reports upon which they intent to rely at trial. The expert reports attached to this submission are:

- Attachment 1: Expert Report of Dr. Stephen Ansolabehere, May 20, 2022 (Gonzales Plaintiffs' Exhibit 6)
- Attachment 2: Supplemental Expert Report of Dr. Stephen Ansolabehere, June 13, 2022 (Gonzales Plaintiffs' Exhibit 7)
- Attachment 3: Rebuttal Report of Dr. Stephen Ansolabehere, July 27, 2022 (Gonzales Plaintiffs' Exhibit 8)

- Attachment 4: Second Supplemental Report of Dr. Stephen Ansolabehere, March 31, 2025 (Gonzales Plaintiffs' Exhibit 9)
- Attachment 5: Addendum to the Second Supplemental Report of Dr. Stephen Ansolabehere, April 28, 2025 (Gonzales Plaintiffs' Exhibit 10)
- Attachment 6: Expert Report of Dr. Allan Lichtman, May 20, 2022 (Gonzales Plaintiffs' Exhibit 11)
- Attachment 7: Rebuttal Report of Dr. Allan Lichtman, July 27, 2022 (Gonzales Plaintiffs' Exhibit 12).

Consistent with the Court's Order, binders containing color copies of the above-referenced reports were delivered to the chambers of each judge on May 2 by Federal Express.<sup>1</sup>

Dated: May 3, 2025

Respectfully submitted,

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<sup>1</sup> Due to an administrative error, the binders that were delivered may include an unsigned copy of Gonzales Plaintiffs' Exhibit 10, rather than a signed copy. Except for a missing signature on the signature page, the reports are identical.

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 3, 2025, and that all counsel of record were served by CM/ECF.

*/s/ David R. Fox*